

**Rebuttal Testimony**

of

**Jason Hendricks**On behalf of the  
Illinois Independent Telephone Association

Docket No. 00-0596

OFFICIAL FILE

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IITA 2.0

WITNESS

Date 1-17-02 [Signature]

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14 Q. Please state your name and business address.

15 A. My name is Jason Hendricks, and my business address is 3220 Pleasant Run, Springfield,  
16 Illinois 62707.

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18 Q. Are you the same Jason Hendricks who submitted direct testimony in this proceeding?

19 A. Yes, I previously submitted direct testimony on behalf of the Illinois Independent  
20 Telephone Association.

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22 Q. What is the purpose of your testimony at this stage of this proceeding?

23 A. The purpose of my testimony is to address certain concerns raised by the testimony of  
24 Joseph P. Riolo filed in this proceeding on November 5, 2001 on behalf of the City of  
25 Chicago. Specifically, I will address Mr. Riolo's proposal to require reporting of "more  
26 comprehensive" information than required by Section 13-712(f) of HP 2900.

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28 Q. What are the IITA's concerns regarding Mr. Riolo's proposal to include additional  
29 measurement and reporting requirements?

30 A. Essentially, my concerns are the same as those I expressed in my direct testimony  
31 regarding Staff's proposal to include certain additional requirements in sections 730.115  
32 (Reporting), 730.510 (Answering Time), 730.515 (Central Office Administrative

33 Requirements), 730.535 (Interruptions of Service) and 730.540 (Installation Requests).  
34 However, those concerns are even greater now since Mr. Riolo proposes reporting of  
35 even "more comprehensive" information. As mentioned in my direct testimony, the IITA  
36 believes that without sufficient evidence demonstrating that they will significantly  
37 increase service quality levels, any additional reporting requirements will amount to  
38 nothing more than arbitrary regulation which will subject local exchange carriers in  
39 Illinois to additional financial and administrative burden which is neither reasonable nor  
40 necessary.

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42 As a practical matter Mr. Riolo incorrectly assumes that all of the additional information  
43 he believes should be reported is currently or may easily be collected by all local  
44 exchange carriers. To the contrary, as indicated in my direct testimony many small  
45 carriers do not currently have systems in place to collect all of the required information.  
46 By way of example, unlike the larger local exchange carriers that have their operator,  
47 business and repair office calls answered electronically, the vast majority of the smaller  
48 carriers still utilize actual live company representatives to answer such calls. Using such  
49 a manual process, it just is not feasible or even possible to measure and keep records of  
50 the answer times for customer call and repair centers as required by Staff's and Mr.  
51 Riolo's proposal.

52  
53 In order to adapt to and ultimately comply with additional reporting requirements, many  
54 small carriers would have to install new office systems, perform substantial upgrades to  
55 existing office systems, add new personnel and/or train existing personnel. The costs in  
56 connection with such actions will necessarily be significant from a small carrier  
57 perspective. It is simply not reasonable to require carriers to incur such costs without any  
58 demonstration that consumers will see an equal or greater benefit from the additional  
59 requirements in the form of a significant increase in already high service quality levels.

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61 Q. Are waivers from the requirements of Code Part 730 available for companies that cannot  
62 meet them?

63 A. Yes, waivers are available pursuant to Section 730.110 in Part 730 as proposed by the  
64 Commission's Staff. However, seeking and obtaining such waivers will also require  
65 affected carriers to incur significant costs. In addition, the Commission will be burdened  
66 by addressing numerous petitions. Such costs and burden can easily be avoided if the  
67 Commission shows appropriate restraint and decides to limit reporting requirements to  
68 those absolutely required by HB 2900. Ultimately, if Code Part 730 as revised and  
69 adopted in this docket includes additional reporting requirements such as those proposed  
70 by the Staff and by Mr. Riolo, the Commission should expect a significant number of  
71 petitions for waivers to be filed by IITA member companies pursuant to section 730.110.

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73 Q. Does that complete your direct testimony?

74 A. Yes, it does.